

Decision 16-09-056**FILED****BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**11-15-16
01:48 PM

Order Instituting Rulemaking to Enhance the Role of
Demand Response in Meeting the State's Resource
Planning Needs and Operational Requirements.

R. 13-09-011
(Filed September 19, 2013)

**INTERVENOR COMPENSATION CLAIM OF Sierra Club
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF Sierra Club**

NOTE: After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD, supporting EXCEL Timesheets, and any other supporting documents to the Intervenor Compensation Program Coordinator at Icompcoordinator@cpuc.ca.gov.

Intervenor: Sierra Club	For contribution to Decision (D.) 16-09-056
Claimed: \$26,934.25	Awarded: \$
Assigned Commissioner: Florio	Assigned ALJ: Kelly Hymes
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
Signature:	/s/ Alison Seel
Date: 11/15/16	Printed Name: Alison Seel

PART I: PROCEDURAL ISSUES (to be completed by Intervenor except where indicated)

A. Brief description of Decision:	D.16-09-056 ("Decision") modifies the earlier decision in this docket (D. 14-12-024) by rescinding the requirement to collect data on fossil-fueled back-up generation in demand response programs, and instead instituting a prohibition on using diesel, natural gas, gasoline, propane, or liquefied petroleum gas technologies to respond to demand response calls beginning January 1, 2018. The Decision also establishes a process through which parties will propose an enforcement program for the prohibition. In addition, the Decision provides general guidance on future demand response programs, establishing guiding principles and a five-year budget cycle.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	10/24/2013	
2. Other specified date for NOI:	n/a	
3. Date NOI filed:	11/25/2013	
4. Was the NOI timely filed?		
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.14-02-001	
6. Date of ALJ ruling:	July 25, 2014	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.14-02-001	
10. Date of ALJ ruling:	July 25, 2014 [See Comment #1]	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.16-09-056	
14. Date of issuance of Final Order or Decision:	10/05/2016	
15. File date of compensation request:	11/14/2016	
16. Was the request for compensation timely?		

C. Additional Comments on Part I (use line reference # as appropriate):

#	Intervenor’s Comment(s)	CPUC Discussion
1	It has been more than one year since Sierra Club’s last finding of significant financial hardship. Requests for a renewed finding are currently pending in the following dockets: R. 14-10-003, R. 15-03-010, R. 16-02-007, A. 16-06-013, and A. 15-09-013.	

PART II: SUBSTANTIAL CONTRIBUTION (to be completed by Intervenor except where indicated)

A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059). (For each contribution, support with specific reference to the record.)

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>After the initial decision in this docket, Sierra Club focused on resolving the open issues surrounding the use of fossil-fueled engines to provide demand response (DR). Sierra Club consistently bugged the Commission (pun intended) “to take definitive action to enforce its 13-year-old statements that demand response cannot be provided by fossil-fueled generators.” Sierra Club Response to ALJ Ruling on 2018 and Beyond DR Programs (July 1, 2016), p. 1.</p> <p>1. Utility Data Collection Advice Letters:</p> <p>Our first area of engagement was protesting the utilities’ plans to collect data on the use of fossil resources in DR programs, as required by D.14-12-024.</p> <p>“A data collection process is also not necessary to confirm the Commission’s clear position. The survey may illuminate the extent of the BUG problem, but the Commission has already determined that using BUGs to respond to a demand response event is ‘antithetical to the</p>	<p>The Decision adopts the position of Sierra Club and other environmental and ratepayer parties, and decides to “move forward with a prohibition of certain resources in demand response programs.” Decision, p. 2.</p> <p>The Decision ultimately accepted the protests of Sierra Club and other parties, and abandoned the data collection effort. Decision, p. 2.</p> <p>“[T]he record shows that current Commission and California policies, along with questions regarding the accuracy of the data and the potential costs to collect the data, all combine to negate the benefit of collecting the data.” Decision p. 19.</p>	

<p>efforts of the Energy Action Plan and the Loading Order.” Sierra Club Comments on Energy Division Staff Proposal (Oct. 15, 2015), p. 2.</p> <p>The proposed plan did “not propose mandatory reporting and provide[d] no consequences for demand response participants who decline to respond. The ... permissiveness will likely result in limited data collection that will frustrate a full and accurate understanding of the scope of BUG use.” Protest of Sierra Club to PG&E Advice Letter (AL) 4582-E, SDG&E AL 2700-E, and SCE AL 3173-E (March 9, 2015), p. 2.</p> <p>Sierra Club had four main critiques of the data collection effort:</p> <p>(1) “Many older fossil generators only have odometer-style meters.” Sierra Club Response to ALJ Ruling on 2018 and Beyond DR Programs (July 1, 2016), p. 3.</p> <p>(2) “No AQMD requires customers to obtain permits for BUGs smaller than 50 horsepower. Therefore the absence of an AQMD permit does not prove a customer does not own a BUG: the customer could own a smaller engine that does not need a permit.” Sierra Club Comments on Staff Proposal (Oct. 15, 2015), p. 6.</p> <p>(3) The proposed plans did “not propose mandatory</p>	<p>“Sierra Club maintains that the lax current regulations on back-up generation metering would also lead to inaccurate and incomplete data.” Decision, p. 23.</p> <p>The decision identified four “main ‘flaws’” [with the data collection effort]:</p> <p>1) “The meter data requested by the Utilities is ‘likely to be in the form of cumulative run hours’ and this data does not necessarily indicate whether a back-up generator was used during a demand response event;”</p> <p>2) “Operating data may only be available for back-up generators that are 50 horsepower or larger; ...”</p> <p>3) “The data collection plan relies on the back-up generator owners voluntarily</p>	
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<p>reporting and provide[d] no consequences for demand response participants who decline to respond.” Protest of Sierra Club to PG&E Advice Letter (AL) 4582-E, SDG&E AL 2700-E, and SCE AL 3173-E (March 9, 2015), p. 2</p> <p>(4) “A data collection process will result in unnecessary delay and cost and may not even yield accurate results.” <i>See also</i> Comments on Proposed Guidance for the 2017 DR Programs (Aug. 26, 2015), p. 3.</p>	<p>providing the required data; and ...”</p> <p>4) “Cost estimates for the data collection are unknown.” Decision, pp. 21-22.</p>	
<p>2. Use of Fossil-Fueled Generation in Demand Response Auction Mechanism (DRAM) Pilot:</p> <p>Sierra Club successfully advocated for a prohibition on fossil resources in the DRAM, setting the stage for the broader prohibition adopted by the Decision.</p> <p>In Sierra Club’s <i>Protest to SCE Advice Letter (AL) 3208-E and PG&E AL 4618-E on Demand Response Auction Pilot Pursuant to Ordering Paragraph 5 of Decision 14-12-024</i> (May 11, 2015), Sierra Club argued that “Only by disallowing participation by fossil generators will the pilot truly provide useful data on how carbon-free resources can support California’s transition to a more flexible, renewables-based grid.” (p. 3)</p>	<p>The prohibition on certain fossil fuel resources approved in the DRAM is a direct precursor to this Decision, which extends the same prohibition to all utility DR programs.</p> <p>The Commission approved the Alternate Resolution of Commissioner Sandoval, which accepted Sierra Club’s protest and prohibited fossil resources in the DRAM. Resolution E-4728 (July 23, 2015). In doing so, the Commission wrote that this exclusion would be instructive on the feasibility of a broader prohibition, writing, “Disallowing fossil-fueled BUGs in this pilot program could provide additional insight for the Commission when it decides the overall policy on fossil-fueled BUGs.” Resolution E-4728, p. 15.</p>	

<p>Sierra Club then advocated for consistency between the DRAM and other DR programs to prevent reshuffling, writing that any rules adopted for utility demand response programs that differed from existing DRAM rules should, for the sake of consistency, also be extended to future DRAM auctions. Sierra Club’s Protest to SCE AL 3292-E, PG&E AL 4719-E, and SDG&E AL 2796-E on the DRAM Pilot for 2017 (Oct. 29, 2015),</p> <p>“The Commission should extend the same prohibition on BUGs, using the same definition as in Resolution E-4728, to all Utility demand response programs. This change is necessary not only because it is sound environmental policy, but also because of the importance of maintaining consistent rules between the DRAM and the Utilities’ other demand response programs.” Sierra Club Comments on Proposed Guidance for 2017 DR Programs (Aug. 26, 2015), p. 2.</p>	<p>The Commission agreed that rules on fossil resources in DRAM and the utility programs should move together, “concur[ring] with ORA and Sierra Club that the pro forma [DRAM] contract should be modified to be consistent with a broader Commission policy on the use of BUGs in conjunction with DR.” Resolution E-4754 (Jan. 28, 2016), p. 10.</p> <p>The DRAM Resolution then prompted the ALJ to scope in the question, “Should the Commission adopt this policy [on fossil resources] for the overall demand response program beginning with the 2017 program year?” <i>ALJ Ruling Allowing Parties to Comment on Proposed Guidance for Utilities’ Proposals for 2017 Demand Response Programs and Activities</i> (August 6, 2015), p. 6. In this way, the Sierra Club’s advocacy on the design of the DRAM precipitated this Decision’s prohibition on the same resources, based on the same principles, in all DR programs.</p>	
<p>3. Use of Fossil-Fueled Generation in Utility Demand Response Programs:</p> <p>(A) <u>DR is Load Reduction, Not Behind-the-Meter Generation.</u></p> <p>“As the Commission has repeatedly determined, the</p>	<p>The Decision adopts Sierra Club’s position that demand response is</p>	

<p>purpose of ratepayer-funded demand response programs is to reduce system demand through load shifting, not to subsidize highly polluting back-up generation.” Protest of Sierra Club to PG&E AL 4582-E <i>et al.</i>, p. 1 (<i>citing</i> D. 14-12-024, p. 50, holding that “the use of back-up generation in demand response programs is antithetical to the Energy Action Plan and the Loading Order.”)</p> <p>“This consistent and straightforward understanding that true demand response is provided only by load reductions is shared by the California legislature, which found that the purpose of authorizing demand response programs is to ‘reduce emissions of greenhouse gases and other pollutants from the electricity sector’ and in doing so ‘help meet the state’s greenhouse gas reduction goals.’” Sierra Club Comments on Proposed Guidance for 2017 DR Programs (Aug. 26, 2015), p. 2.</p> <p>“Yet absent a definitive prohibition, this shadow practice has been allowed to continue, polluting local communities, undermining public confidence in demand response as a clean energy resource, and crowding out legitimate demand response solutions.” Sierra Club Reply Comments on Staff Proposal (Oct. 19, 2015), p. 1.</p>	<p>intended to be provided by demand reductions, not by burning fossil fuels: “Considered by the Commission to be policies of the highest importance, the Energy Action Plan and the Loading Order indicate a preference for cleaner technologies. More recently, Public Utilities Code Section 380.5 ... makes clear that efforts to incorporate demand response into the state’s resource adequacy program should also reduce greenhouse gas emissions.” Decision p. 20.</p> <p>The Decision also notes that the Commission’s long-standing policy statement against the use of backup generation in DR must be enforceable, writing, “The Commission’s adopted policy statement regarding fossil-fueled back-up generation essentially has no effect without any associated conditions or requirements.” Decision, p. 21</p>	
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<p>B) <u>Verification of Prohibited Resource Ownership</u></p> <p>“[S]ite visits are needed to verify that customers do not own a BUG because verification through air quality management district (“AQMD”) records will not be sufficient. No AQMD requires customers to obtain permits for BUGs smaller than 50 horsepower. Therefore the absence of an AQMD permit does not prove a customer does not own a BUG.” Sierra Club Comments on ED Staff Proposal, p. 6.</p> <p>C) <u>Enforcement of Ban on Use of Prohibited Resources</u></p> <p>A separate issue in this proceeding was -- once ownership of prohibited resources has been verified -- how compliance with the ban on generator usage should be monitored.</p> <p>Sierra Club argued strongly that the proposal for non-residential customers “to merely attest that they will not rely on fossil-fueled generation should not be an acceptable compliance method.” Sierra Club Comments on Proposed Guidance for 2017 DR Programs (Aug. 26, 2015), p. 3.</p>	<p>The Decision ultimately appears to support site visits to verify prohibited resource ownership, holding that “a selective audit program should provide the balance of verification.” Decision, p. 42.</p> <p>The Decision recognizes Sierra Club’s position that site visits are necessary to verify ownership of prohibited resources: “ORA and Sierra Club argue that annual site visits are needed because neither self-attestation nor verification through [local Air District permit] data are sufficient.” Decision, p. 41.</p> <p>Enforcement was extensively discussed throughout the proceeding, but the Commission ultimately did not make a decision on what type of enforcement and monitoring regime was appropriate, instead directing the utilities to hire a consultant to make a determination. Decision, p. 40.</p> <p>“In comments to the proposed decision, ORA and Sierra Club/EDF argue that the Commission should impose metering requirements as opposed to attestation, contending that attestation is insufficient.” Decision, p. 39.</p>	
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<p>We initially advocated for both “a contractual obligation and separate metering on BUG units to enable monitoring and enforcement.” Sierra Club Comments on Proposed Guidance for 2017 DR Programs (Aug. 26, 2015), p. 3. When Energy Division Staff Proposal proposed allowing BUG owners the choice of a default adjustment or installation of a data collecting device, the Sierra Club supported this suggestion. <i>See</i> Sierra Club Comments on Energy Division Staff Proposal, p. 5.</p> <p>We argued that the Staff Proposal’s requirements were not overly onerous, as “newer generators may already have this capability, and for older equipment simple data loggers are available for under \$100. By contrast, typical revenues from participating in PG&E’s Base Interruptible Program are three orders of magnitude higher, averaging \$120,000 per customer in 2015.” Sierra Club Response to ALJ Ruling on 2018 and Beyond DR Programs (July 1, 2016), p. 5. <i>See also</i> Sierra Club Comments on ED Staff Proposal, p. 5 (comparing meter requirements in SGIP Program).</p> <p>Sierra Club pointed out throughout the proceeding that “many older fossil generators only have odometer-style meters. As a result, there is no</p>	<p>“In regards to non-residential customers, Sierra and ORA stated in their comments that they support the [Staff Proposal’s] enforcement mechanism, highlighting that the proposal provides options to industrial and commercial customers.” Decision, p. 34.</p> <p>“Sierra Club/EDF maintains that in light of the high payments participants receive, devices to meter the use of prohibited resources are not expensive.” Decision, p. 39</p> <p>Consistent with this argument, the Commission recognized that “prudence requires some measure of verification.” Decision, p. 42. Implicitly agreeing with Sierra Club’s fundamental point</p>	
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<p>way to verify whether the engine was on during a demand response event.... With no way to verify compliance, transparency is nonexistent and enforcement is not possible.” Comments on ALJ Ruling, p. 3. <i>See also</i> Sierra Club/EDF Comments on PD, pp. 2, 5 (“Indeed, it is entirely unclear how a legitimate audit can be conducted where the only available record is attestation, with no actual tracking of usage of the prohibited resource.”).</p>	<p>that verification requires some sort of data on generator usage, it directed the utilities to hire “expert consultants to 1) assess how to evaluate whether customers are complying with the prohibition, and 2) provide recommendations on a verification plan.” Decision, p. 40.</p>	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: Office of Ratepayer Advocates, TURN, Environmental Defense Fund, and the Natural Resources Defense Council.		
d. Intervenor’s claim of non-duplication: Sierra Club worked closely with allied groups in this proceeding to form an effective coalition in support of a ban on fossil-fueled backup generators. By collaborating closely with ORA and by filing jointly with NRDC and EDF when appropriate, Sierra Club was able to keep duplicative work to a minimum while still demonstrating to the Commission that a broad coalition of parties strongly supported this long-overdue change in policy.		

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

C. Additional Comments on Part II (use line reference # or letter as appropriate):

#	Intervenor's Comment	CPUC Discussion

PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Intervenor except where indicated)

A. General Claim of Reasonableness (§ 1801 and § 1806):

<p>a. Intervenor's claim of cost reasonableness: As a result of Sierra Club's participation in this proceeding, California ratepayers will no longer pay demand response participants to use polluting generation during demand response events. This new prohibition, if a sufficient enforcement regime is recommended by the utility consultant, will end the years' long problem of utility customers paying for clean demand reductions they are not actually receiving. In addition, by removing the incentive to run these polluting resources in order to generate demand response revenue, all ratepayers will benefit from reduced air pollution and improved human and environmental health.</p> <p>Taken together, the benefits obtained by Sierra Club far exceed the cost of Sierra Club's participation in the proceeding. Sierra Club's claim should be found to be reasonable.</p>	<p>CPUC Discussion</p>
<p>b. Reasonableness of hours claimed: This phase of the proceeding required substantial time investment over a period of 2 years. Sierra Club was very cognizant of minimizing duplication, while also ensuring the concerns shared by all non-industry parties were fully raised and the broad consensus could be noted. Sierra Club coordinated the joint efforts of the interested environmental groups and took the lead on drafting many joint pleadings.</p>	
<p>c. Allocation of hours by issue: 1) Data Collection: 32% 2) DRAM : 16% 3) IOU Programs: 52%</p>	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Alison Seel	2015	79.9	190	D.16-01-022	15,181			

Alison Seel	2016	31.9	205	D.16-05-046	6,539.50									
Matt Vespa	2016	12.7	350	D.16-05-046	4,445									
Subtotal: \$26,165.50						Subtotal: \$								
OTHER FEES														
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):														
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$						
[Person 1]														
[Person 2]														
Subtotal: \$						Subtotal: \$								
INTERVENOR COMPENSATION CLAIM PREPARATION **														
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$						
Alison Seel	2016	7.5	102.5	½ Full Rate	768.75									
Subtotal: \$ 768.75						Subtotal: \$								
COSTS														
#	Item	Detail			Amount	Amount								
TOTAL REQUEST: \$ 26,934.25						TOTAL AWARD: \$								
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate</p>														
ATTORNEY INFORMATION														
Attorney		Date Admitted to CA BAR²		Member Number		Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation								
Matthew Vespa		2002		222265		No								
Alison Seel		2014		300602		No								

² This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

C. Attachments Documenting Specific Claim and Comments on Part III (Intervenor completes; attachments not attached to final Decision):

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Time Sheets for Matt Vespa
Attachment 3	Time Sheets for Alison Seel

D. CPUC Disallowances and Adjustments (CPUC completes):

Item	Reason

PART IV: OPPOSITIONS AND COMMENTS

Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (see § 1804(c))

(CPUC completes the remainder of this form)

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. Intervenor [has/has not] made a substantial contribution to D._____.
2. The requested hourly rates for Intervenor's representatives [,as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [,as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$_____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Intervenor is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay Intervenor the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Intervenor their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated.”] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of Intervenor’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

**Attachment 1:
Certificate of Service by Customer**

(Filed electronically as a separate document pursuant to rule 1.13(b)(iii))

(Served electronically as a separate document pursuant to Rule 1.10(c))

I hereby certify that I have this day served a copy of the foregoing **INTERVENOR
COMPENSATION CLAIM OF [Intervenor's Name] AND DECISION ON
INTERVENOR COMPENSATION CLAIM** by (check as appropriate):

- ☐ hand delivery;
- ☐ first-class mail; and/or
- ☐ electronic mail

to the following persons appearing on the official Service List:

[Insert names and addresses from official Service List]

Executed this [day] day of [month], [year], at [city], California.

[Signature]

[Typed name and address]

R. 13-09-011 Sierra Club - Time Sheets for Matt Vespa

		Issues			Total
		1) Utility Data Collection Advice Letters	2) Use of BUGs in DRAM	3) Use of BUGs in Utility DR	
Date	Description				
9/19/2016	Review, edit Opening Comments on PD	0	0	2.4	2.4
9/20/2016	Ex Parte with Picker's Office, draft ex parte notice, review Opening Comments on PD	0	0	4.9	4.9
9/21/2016	Ex Parte with Florio Office, draft reply comments on PD, coordinate with EDF	0	0	2.5	2.5
9/22/2016	Ex Partes with Peterman, Randolph's offices, finalize ex parte notice, draft reply PD	0	0	1.9	1.9
9/23/2016	Draft reply PD comments, circulate to EDF	0	0	1	1
TOTAL		0	0	12.7	12.7

R. 13-09-011 Sierra Club - Time Sheets for Alison Seel

Date	Description	Issues			Total
		1) Utility Data Collection Advice Letters	2) Use of BUGs in DRAM	3) Use of BUGs in Utility DR	
2/17/2015	Read D. 14-12-024 and past Sierra Club filings for background on issues	3.5			3.5
2/19/2015	Meeting with ORA staff re: issues of concern in potential protest	2.5			2.5
2/20/2015	Begin rough draft of protest to Advice Letters	5.2			5.2
2/23/2015	Attend workshop on data collection plan	5.5			5.5
2/24/2015	Draft Protest to Advice Letters (data collection)	4.5			4.5
2/25/2015	Draft Protest to Advice Letters (data collection)	3.5			3.5
2/26/2015	Revise Protest to incorporate Matt's comments	4.5			4.5
3/3/2015	Revise Protest to incorporate Susan's comments	3			3
3/9/2015	Finalize and send out Data Collection AL Protest	1			1
4/21/2015	Read DRAM ALs		0.7		0.7
5/7/2015	Drafting protest to DRAM AL - resource adequacy issue		6		6
5/8/2015	Drafting protest to DRAM AL - metering		3.5		3.5
7/8/2015	Draft Joint comments on DRAM Resolution		6.2		6.2
7/13/2015	Finalize joint comments on DRAM Resolution		2		2
8/24/2015	Draft comments on 2017 DR Programs Proposal (DRAM/IOU program linkage)			3.7	3.7
8/26/2015	Finalize comments on 2017 DR Programs Proposal (DRAM/IOU program linkage)			0.7	0.7
10/8/2015	Read Staff Proposal			1	1
10/8/2015	Discuss response to Staff Proposal with Matt			0.5	0.5
10/8/2015	Begin outlining comments on Staff Proposal			3	3
10/9/2015	Draft Comments on Staff Proposal - Q.1 Abandon data collection	2.3			2.3
10/12/2015	Draft Comments on Staff Proposal - Q.2/3 prohibited resources/storage			4.6	4.6
10/13/2015	Draft Comments on Staff Proposal - Q 4-10 metering and enforcement			7	7
10/14/2015	Finalize comments on Staff Proposal			3.5	3.5
10/19/2015	Read and edit Reply Comments on Staff Proposal (Matt drafted)			2	2
2015 Subtotal		35.5	18.4	26	79.9
1/13/2016	Attend Workshop on Staff Proposal			5	5
1/25/2016	Review workshop notes for corrections			0.2	0.2
4/20/2016	Email correspondence with Itron re: metering/data logging technology			0.6	0.6
4/21/2016	Research data logging technology			2	2
6/27/2016	Review LBNL DR Future Report to respond to "2018 and Beyond" DR Ruling			3	3
6/29/2016	Draft response to "2018 and Beyond" DR Ruling (BUGs unnecessary)			3.6	3.6
6/30/2016	Draft response to "2018 and Beyond" DR Ruling (advocate for metering)			6.2	6.2
9/6/2016	Read Hymes PD			1	1
9/12/2016	Begin drafting/outlining Comments on PD			5	5
9/14/2016	Finish drafting Comments on PD			5.3	5.3
2016 Subtotal		0	0	31.9	31.9

TOTAL	35.5	18.4	57.9	111.8
Percentage time by issue	32%	16%	52%	

Icomp Preparation				
10/25/2016 Prepare IComp Claim	4			
10/28/2016 Prepare IComp Claim	3.5			
TOTAL				7.5